

Sage Legal LLC

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March 28, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Nina R. Morrison, U.S.D.J.
225 Cadman Plaza East
Courtroom 6E North
Brooklyn, NY 11201-1804

Re: Rodriguez, *et ano* v. Crown Heights Pizza, LLC, *et al.*
Case No.: 1:24-cv-2848 (NRM) (RML)

Dear Judge Morrison:

This firm represents the Defendants in this case. Defendants write jointly with Plaintiffs to respectfully submit this letter motion for an extension of time to complete mediation. The current deadline is March 31, 2025; the parties respectfully request an extension of time through and including June 2, 2025¹.

Pursuant to ¶ 1.7 of this Court's Individual Practice Rules, Defendants respectfully submit that:

- (i) The reason for the request is that although the parties timely confirmed a mediation on March 11, 2025, there was a miscommunication such that the mediator was unaware that it was confirmed. As a result, the mediator was no longer available on the confirmed date. The mediator's earliest available dates for mediation are the week of April 28, 2025.
- (ii) The original date for the completion of mediation is March 31, 2025.
- (iii) There have been no previous requests for an extension of time to complete mediation;
- (iv) This request is being submitted jointly; therefore, Plaintiffs consent; and
- (v) The parties request an extension of time through and including June 2, 2025 to complete mediation, and through and including June 16, 2025 to file a status report.

For the foregoing reasons, the parties submit that there exists sufficient good cause for an extension of time and thank this Court for its time and attention.

¹ May 31, 2025 falls on a Saturday.

Dated: Jamaica, New York
March 28, 2025

Respectfully submitted,

SAGE LEGAL LLC

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